

# EXHIBIT 11

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re:

BOY SCOUTS OF AMERICA AND  
DELAWARE BSA, LLC,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-10343 (LSS)

Jointly Administered

Re: D.I. 1974, 1975

ORDER GRANTING IN PART INSURERS' MOTION FOR AN ORDER  
AUTHORIZING CERTAIN RULE 2004 DISCOVERY [D.I. 1974, 1975]


Upon the motion (the "Motion")<sup>2</sup> of Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America and Indemnity Insurance Company of North America, Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company and Hartford Accident and Indemnity Company, First State Insurance Company and Twin City Fire Insurance Company (collectively, "Century and Hartford") for entry of an Order granting certain relief requested in the Motion [D.I. 1974, 1975], which was joined by the Allianz Insurers (as defined in the Joinder) [D.I. 2026], Liberty Mutual Insurance Company (as defined in the Joinder) [D.I. 2168], and AIG (as defined in the Joinder) [D.I. 2114] (collectively, the "Joinder Parties" and, together with Century and Hartford, the "Insurers"); and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being

<sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's federal tax identification number, are as follows: Boy Scouts of America (6300) and Delaware BSA, LLC (4311). The Debtors' mailing address is 1325 West Walnut Hill Lane, Irving, Texas 75038.

<sup>2</sup> All capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Motion.

proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided; and the Court having found and determined that the relief sought in the Motion is appropriate and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and on the basis of the record and evidence submitted to the Court and in consideration of the arguments made; it is HEREBY ORDERED THAT:

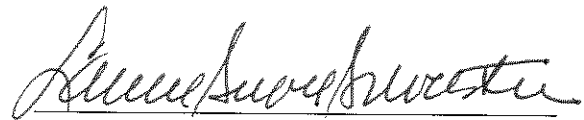
1. The Motion is GRANTED to the extent set forth on the record at the August 30, 2021 hearing, which is incorporated by reference herein.

2. The Insurers are authorized under Bankruptcy Rules 2004 and 9016 to issue subpoenas seeking the production of documents and information responsive to the requests set forth in Exhibit E to the Motion to the entities identified in Exhibit C (Verus Claims Services LLC, Consumer Attorney Marketing Group, Archer Systems, and Stratos Legal) and ~~Reciprocity Industries, LLC~~  and to issue subpoenas compelling testimony on behalf of the entities.

3. Any documents produced to Insurers in response to the subpoenas authorized under this Order shall also be produced to all insurers and the Debtors, the Official Tort Claimants' Committee ("TCC"), the Coalition of Abused Scouts for Justice (the "Coalition") and the Future Claimants' Representative ("FCR"), and all insurers, the Debtors, the TCC, the Coalition, and the FCR shall have the right to attend and participate in any depositions authorized under this Order. All parties' rights under Bankruptcy Rule 2004 or other applicable laws to seek further document productions and written and oral examinations in connection with these Chapter 11 Cases are expressly preserved.

4. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

Dated: September 9, 2021



United States Bankruptcy Judge

5. Due to notice concerns raised in Mr. Simon's letter (DI 6166), I have not included Reciprocity ~~Center~~ Industries, LLC in this Order. Nothing precludes Century, Hartford or any other person from separately pursuing discovery from Reciprocity Industries LLC. (JS)